



LEIBEL LAW

PERSONAL INJURY • BUSINESS LITIGATION

STEVEN LEIBEL, P.C.

July 2, 2021

VIA USPS MAIL

G. Graham Thompson, Esq.
Copeland, Stair, Kingma & Lovell, LLP
735 Broad Street
Suite 1204
Chattanooga, TN 37402

RE: Our Client: Alberta Perry, the widow of Vincent McKinney
 Date of Incident: April 15, 2021

Dear Mr. Thompson:

We are in receipt of your letter dated June 25, 2021. As you know, I requested information concerning the forklift and other pertinent information which will be at issue in this case, which you refused to provide:

- Regarding my request for insurance information, you responded, "We will not provide out client's insurance information at this time."
- Regarding my request for recorded statements, medical records, photographs, and other documents, you responded, "We are in possession of photographs taken as part of the investigation of the incident; however, as the investigation is ongoing, we will not disclose those photographs at this time."
- Regarding my request for information on the premises and forklift, you responded, "Jenkins & Stiles is not the owner of the premises at 7640 Oak Ridge Highway, or the forklift that was involved in the incident. Therefore, please contact the owner(s) of those properties to schedule any inspection."

I fail to understand the need to preserve the logbooks and truck information when your insured negligently killed my client's husband while removing the load from the trailer. Be assured that we are mindful of our obligations under the law. As no lawsuit has commenced, we have no obligation to allow you to inspect the truck and trailer or provide the logbooks at this time.

Mr. Thompson
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I am frustrated by your client's refusal to cooperate with us, as cooperation is a two-way street. Please ask your client if you can accept service on their behalf when the lawsuit is filed.

Yours Truly,

STEVEN LEIBEL, P.C.



Steven Leibel

SKL/ds